

**REMARKS**

Applicant has amended this application in response to the office action.

In particular, the claims have been amended to address the various objections and rejections the examiner has made under 35 U.S.C. §112. In addition, formal drawings are now submitted.

The claims have all been amended to make clear what is meant by the heat pump being "on" and "off." When a heat pump is "off," refrigerant is not flowing through the heat exchangers. The Kuroki, et al. patent may well reverse water through its heat exchanger in a defrost application, however, it does so while refrigerant is also flowing through that heat exchanger. See the discussion of the second and third embodiments across column 5. Thus, the Kuroki, et al. heat pump is not in an "off" state when the reverse flow of water is occurring. Applicant's invention is intended to prevent freezing when the heat pump is "off." Kuroki, et al. does not address nor recognize this concern.

For the reasons set forth above, all claims are allowable. An indication of such is solicited.

Respectfully submitted,

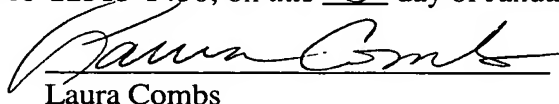


Theodore W. Olds, Reg. No. 33,080  
Carlson, Gaskey & Olds  
400 W. Maple Road, Ste. 350  
Birmingham, MI 48009  
(248) 988-8360

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**CERTIFICATE OF MAIL**

I hereby certify that the enclosed Response is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 5 day of January, 2007.

  
Laura Combs